

## **PROJECT UPDATES FOR MSR**

**Project Description:** In the late 1980s and early '90s, the California Department of Health Services – the predecessor of the Department of Toxic Substances Control (DTSC) –classified metal shredder residue as non-hazardous waste. This decision was based upon the best science at the time, but much has changed since then: vehicles and appliances and the materials they are made from are different; and technology has changed. These factors prompted DTSC to revisit decisions made more than 20 years ago.

**Regulatory References:** All major metal shredders in California (seven active locations) are operating under a variance issued by DTSC (then DHS) in the late 1980s. This variance, also known as “f” letters, authorized facilities to manage “treated automotive shredder waste” (TASW) pursuant to CCR, title 22, section 66260.200(f) and DTSC Policy and Procedure No. 88-6.

### **Project Correspondence:**

- **June 13, 2013** - Response letter from DTSC to Ms. Alice Sterling to provide update of the departments current activities on the reevaluation of metal shredder facilities practices and path forward.
- **July 11, 2013** - DTSC Responses to initial *Draft Auto Shredder Residue Treatability Study Workplan*, submitted by the California Chapter, Institute of Scrap Recycling Industries (ISRI).
- **September 26, 2013** - Receipt of 2<sup>nd</sup> *ISRI Draft Auto Shredder Residue Treatability Study Workplan*.
- **October 10, 2013** – Request letters for Participation in Review of Metal Shredder Residue (MSR) Practices sent to State and Local enforcement agencies.

### **Meetings:**

- **August 9, 2013** - Margaret Rosegay requested the meeting to review and respond to DTSC's July 11, 2013 letter regarding DTSC Responses to the *Draft Auto Shredder Residue Treatability Study Workplan*. Ms. Rosegay went over each point identified in the letter and received clarification from DTSC staff and agreed to include additional details in the formal version, which was expected to be submitted by 8/15/2013. Ms. Rosegay stated that they would not have it ready by then, and offered to send a letter to DTSC requesting an extension. Subsequent discussion centered on sampling approaches and sample

preparation, and the need for a consistent methodology and QA/QC to be established and followed throughout the treatability study and across the various metal shredding facilities and analytical laboratories.

- **August 15, 2013** - DTSC staff from Policy and Program Support, and Office of Legal Counsel met with Chuck White and Brian Bowen from Waste Management. Mr. White requested the meeting to learn about DTSC's Metal Shredder Residuals project. Waste Management offered to help in DTSC's MSR industry evaluation by providing existing groundwater monitoring and leachate data, and by offering site visits to landfills for potential sample collection. Waste Management operates two of the larger landfills accepting treated auto shredder waste (TASW), Altamont (2<sup>nd</sup> largest) and Simi Valley (3<sup>rd</sup>). Waste Management's Altamont Landfill has a new TASW sampling requirement imposed by the State's Regional Water Quality Control Board (SRWCB) in which they must sample TASW loads "once per 1,000 tons." Mr. White offered to provide DTSC a list of issues of importance for landfills accepting treated metal shredder residues that may assist DTSC in its evaluation of MSR.
- **September 16, 2013** - Meeting held with CalRecycle staff to provide status of DTSC MSR project and discuss their participation in public workshops and assistance in review of treatability study documents. DTSC requested CalRecycle to review and provide comments for DTSC MSR project workplan, industry treatability study workplan, and to provide management and technical POCs for project coordination.

#### General Updates:

- **October 2013**
  - Phone contacts currently occurring with local and regional CUPA's, air districts, waterboards, and local enforcement agencies to set up regional meetings for the agencies to discuss participation in the MSR review process.
  - Public workshops to start in December 2013. Actual dates and notifications should occur by mid-November.

#### Stakeholders/Partners:

Institute of Scrap Recycling Industries  
CalRecycle  
ARB  
SWRCB  
CUPA's  
Local Enforcement Agencies  
Landfill Operators